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REMARKSI. Introduction

In response to the Office Action dated April 6, 2007, which was made final, claims 27, 30 and 40 have been amended. Claims 20-40 remain in the application. Entry of these amendments, and re-examination and re-consideration of the application, as amended, is requested.

II. Prior Art RejectionsA. The Office Action Rejections

In section (3) of the Office Action, claim 20 was rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,274,795 (Vachon). In sections (4)-(8) of the Office Action, claims 20, 21, 23-34, and 36 were rejected under 35 U.S.C. §103(a) as being obvious over U.S. Patent No. 4,636,947 (Ward) in view of Vachon. In sections (9)-(22) of the Office Action, claims 22, 24-33, 35, 37-40, 55-74, and 78-81 were rejected under 35 U.S.C. §103(a) as being unpatentable over Ward and Vachon, in view of U.S. Patent No. 5,537,626 (Kraslavsky).

Applicants' attorney respectfully traverses these rejections.

B. Applicants' Claims Are Patentable Over References

Applicants' invention is patentable over the references, because the claims recite limitations not found in the references.

1. Claim 20 is Patentable over Vachon

The Office Action asserts that Vachon teaches all the elements of independent claim 20.

The cited locations of Vachon are set forth below:

Col. 1, lines 55-60

Transfer of data by peripheral devices via DMA without processor intervention, however, is especially suitable for computerized data acquisition applications.

Col. 2, lines 28-30

The present invention is a peripheral I/O bus and programmable interfacing device for interfacing data acquisition peripherals to a main data acquisition processor. The data acquisition peripherals are connected to the peripheral I/O bus which is provided with a direct interface to the main processor bus by the interfacing device.

Col. 2, lines 37-41

The interfacing device is also capable of transferring data between devices located on the peripheral bus as well as performing control functions for those devices requiring processor intervention.

Col. 2, lines 57-61

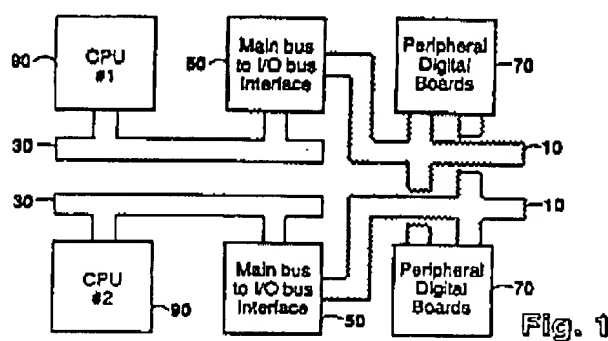
It is a further object of the present invention for the programmable interfacing device to be capable of assuming control responsibilities for slave peripheral devices on the peripheral I/O bus and transferring data between them.

Col. 2, lines 63-66

It is a further object of the present invention for the bits interface to be capable of transferring in DMA block mode data gathered from peripheral devices located on the peripheral I/O bus to the main processor bus.

Applicants' attorney respectfully submits that Vachon does not teach or suggest that each of the peripheral devices has an independent associated control application that communicates directly with each other independent of the central processor, and each peripheral device operates in response to signals generated by the central processor as well as all other peripheral devices whose operation depends on or is connected with the state of that peripheral device.

Consider, for example, FIG. 1 of Vachon which shows the interfacing device 50 of Vachon:



Consider, in another example, the description at col. 3, line 30-35 of Vachon:

The peripheral I/O bus 10 described herein is a **single-master/multiple-slave** bus. The peripheral I/O bus 10 is interfaced to the main processor bus 30 by an intelligent bus interfacing device used as a main bus to I/O bus interface and referred to herein as the bus master 50.

Consequently, in Vachon, the peripheral devices, namely peripheral digital boards 70, only operate under the control of signals generated by the interface device 50, which is the bus master, but do not operate in response to signals generated by all other peripheral devices, namely all other peripheral digital boards 70, whose operation depends on or is connected with the state of that peripheral device.

2. Claims 20, 21, 23-34, and 36 are Patentable over Ward and Vachon

The Office Action also asserts that Ward teaches all the elements of independent claim 20 and dependent claims 21, 23-34 and 36. However, Applicants' attorney notes that this is, in effect, a 103 rejection, because the Office Action relies on Vachon as well as Ward. Specifically, the Office Action acknowledges that Ward does not explicitly state the independent associated control applications being operable to communicate with each other independent of the central processor, but nonetheless cites Vachon as disclosing peripheral devices being able to communicate with each other independent of the central processor through the use of DMA through a peripheral bus. The Office Action then states that it would have been obvious to incorporate Vachon into Ward.

Applicants' attorney disagrees.

As noted above, Vachon does not teach or suggest that each of the peripheral devices has an independent associated control application that communicates directly with each other independent of the central processor, and each peripheral device operates in response to signals generated by the central processor as well as all other peripheral devices whose operation depends on or is connected with the state of that peripheral device. In addition, Applicants' attorney respectfully submits that Ward does not teach or suggest these limitations.

3. Claims 22, 24-33, 35, 37-40, 55-74, and 78-81 are Patentable over Ward, Vachon and Kraslavsky

As noted above, the combination of Ward and Vachon does not teach or suggest all the elements of Applicants' independent claims.

Kraslavsky fails to overcome these deficiencies of Ward and Vachon. Recall that Kraslavsky was cited only against dependent claims 22, 24-33, 35, 37-40, 55-74 and 78-81, and only for the purposes of describing communications links between peripheral devices that allow the peripheral devices to communicate with each other through broadcasting. Specifically, the citation of Kraslavsky refers to a LAN-connected printer that includes a network expansion board (NEB), and

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PC-based software that communicates with that LAN-connected printer. However, Kraslavsky does not teach or suggest a self-service terminal as recited in Applicants' claims.

Thus, the references, taken individually or in combination, fail to teach the Applicants' claimed invention. Further, the various elements of the Applicants' claimed invention together provide operational advantages over the systems disclosed in the references. In addition, Applicants' invention solves problems not recognized by the references. Consequently, Applicants submit that claims 20-40 are allowable over the references.

### III. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

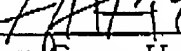
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